

## **REMARKS**

Claims 1 and 3-19 remain pending in the case. Further examination and reconsideration of the presently claimed application are respectfully requested.

### **Allowable Subject Matter**

Applicants wish to thank the Examiner for noting claims 1, 3, and 4 as being allowed (Office Action -- pg. 4). Applicants agree with the characterizations made on page 5 of the Office Action as to why claims 1, 3, and 4 are deemed allowed.

### **Section 102 Rejection**

On the Office Action Summary, only claims 5-19 were noted as being rejected; however, page 2 of the Office Action states that claims 1-19 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,730,634 to Seko (hereinafter "Seko"). Since the Examiner has stated that claims 1, 3, and 4 are allowed, Applicants believe that the first sentence of paragraph 2 on page 2 of the Office Action is a typographical error. Applicants believe the Examiner meant that claims 5-19 were rejected over Seko.

Assuming claims 5-19 were rejected under 35 U.S.C. § 102(b), the Office Action does not state in any way whatsoever the subject matter of independent claims 5 and 13, and reasons why Seko would apply to those independent claims. The Office Action notes on page 2 an apparent applicability of Seko to claims 5 and 12-13; however, the paragraph characterizing claims 5 and 12-13 have nothing whatsoever to do with any of those claims. Instead, the paragraph in question paraphrases claim 1 (which was noted as being allowed). Absent any guidelines in which to analyze, Applicants simply cannot respond to the Office Action in any meaningful way. Thus, Applicants have no choice but to reiterate their position set forth in the previous Response filed May 30, 2003. In that Response, the following distinctive limitations were set forth.

**Seko does not teach a pin retainer for retaining an upwardly extending pin (claim 5) or moving an upwardly extending pin along a y-axis and a z-axis (claim 13).** Present independent claim 5 makes clear that the pin retainer retains the probe pin in an upwardly extending direction. Contrary to the present claimed configuration, the probe pin in Seko must extend downward since the lower surface

of the wafer must be covered by a movable table 15. Seko could not be modified to accommodate an upwardly extending pin unless an opening were placed in the movable table of Seko, similar to that which is shown in present application Fig. 3A.

Not only does Seko fail to teach an upwardly extending probe pin, but Seko also fails to suggest that the probe pin can be moved in both a y-axis and a z-axis, as in present claim 13. Instead, the probe pin only moves along one axis (up/down). While table 15 in Seko can move in the x and y directions, probe pin 22 moves only in the z direction. Conversely, the present claim 13 makes clear that the table containing the substrate moves along an x-axis, but the probe pin moves both in the y-axis and z-axis directions. The probe pin in Seko simply does not have this capability.

**Seko does not teach or suggest a pair of orthogonal walls and a slidable push plate (claim 9).** Claim 9 indicates that a substrate 555 can be secured between a pair of orthogonal walls 530 and a push plate 560 (Specification -- Fig. 2). The push plate 560 is slidably attached to table 540 (Specification -- Fig. 2). Contrary to the characterizations made in the Office Action, Fig. 6A in Seko does not illustrate a pair of elongated walls and a push plate for several reasons. First, insulating support 51 is not used to support the substrate but, instead, supports probe pins (Seko -- Fig. 6A; col. 6, lines 25-30). Second, Seko makes no reference whatsoever to a movable push plate attached to a table for securing a wafer or substrate.

For at least the reasons set forth above, Seko does not teach, suggest, or provide motivation for all limitations of independent claims 5 and 13, as well as various dependent claims such as claim 9. Therefore, claims 5 and 13, as well as claims dependent therefrom, are patentably distinct over the cited art. Accordingly, Applicants respectfully request removal of this rejection.

### **Response to Arguments**

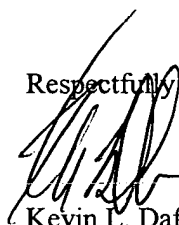
The Office Action further notes an apparent rejection of claim 20 (Office Action -- pg. 4). Applicants note that claim 20 was canceled in the previous Response mailed May 30, 2003.

### CONCLUSION

This response constitutes a complete response to all issues raised in the Office Action mailed August 12, 2003. In view of the remarks traversing the rejections, Applicants assert that allowed claims 1, 3, and 4 as well as rejected claims 5-19 are in condition for allowance. If the Examiner has any questions, comments, or suggestions, the undersigned attorney earnestly requests a telephone conference.

No fees are required for filing this amendment; however, the Commissioner is authorized to charge any additional fees, which may be required, or credit any overpayment, to LSI Logic Corporation, Deposit Account No. 12-2252/01-120.

Respectfully submitted,



Kevin L. Daffer  
Reg. No. 34,146  
Attorney for Applicant(s)

Conley Rose, P.C.  
P.O. Box 684908  
Austin, TX 78768-4908  
Ph: (512) 476-1400  
Date: November 11, 2003